

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Shawn Patterson,)	
)	
Plaintiff,)	07 C 6696
)	
vs.)	Honorable Judge
)	James Zagel
Dr. K Sims)	
Captain Cozalino,)	
Officer Wagner)	
)	
Defendants.)	

DEFENDANT’S MOTION TO DEPOSE INCARCERATED PERSON

NOW COMES Defendants’, K Sims PA, Captain Cozalino, and Officer Wagner through their attorney, RICHARD A. DEVINE, State's Attorney of Cook County, by his Assistant State's Attorney, Michael A. Kuczwara Jr., and pursuant Rule 30(a)(2) of the Federal Rules of Civil Procedure, moves this Honorable Court to take the deposition of Shawn Patterson. In support, Defendant states as follows:

1. That Shawn Patterson has been identified by the Plaintiff as a witness and that the Defendant intends to take the deposition of Shawn Patterson.
2. That Shawn Patterson is presently incarcerated at the Illinois Department of Corrections, Lawrence Correctional Center, in Menard, IL.

WHEREFORE, your Defendants’ K Sims PA, Captain Cozalino, and Officer Wagner, respectfully asks this Honorable Court to allow him to depose the incarcerated witness Shawn Patterson.

Respectfully Submitted,

RICHARD A. DEVINE
State's Attorney of Cook County

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